

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

HILDA BRUCKER; JEFFERY  
THORNTON; JANICE CRAIG; and  
BYRON BILLINGSLEY,

Plaintiffs,

vs.

THE CITY OF DORAVILLE, a Georgia  
municipal corporation,

Defendant.

Civil Action No. 1:18-cv-02375-RWS

**JOINT STIPULATION TO  
DESIGNATING CERTAIN  
INDIVIDUAL TESTIMONY AS  
ORGANIZATIONAL TESTIMONY OF  
DEFENDANT CITY OF DORAVILLE**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiffs have noticed the organizational deposition of Defendant City of Doraville. In order to conserve time and resources, Plaintiffs and Defendant have agreed that the following subjects of the organizational deposition will be answered by certain past individual testimony. Specifically, Plaintiffs stipulate that:

- (1) all matters regarding the administration and organization of the City's Municipal Court will be considered to be answered by the City through the deposition of Corally Rivera, taken March 13, 2020;
- (2) all matters regarding the Municipal Court's policies or practices will be considered to be answered by the City through the deposition of Edward

Scott Carter taken March 12, 2020, and the deposition of Corally Rivera, taken March 13, 2020;

- (3) all matters regarding the administration, organization, and enforcement policies or practices of the City's City Prosecutor office will be considered to be answered by the City through the deposition of Bill Riley taken March 12, 2020; and
- (4) all matters regarding the organization and administration of the City's finances, including how the City identifies, treats, and classifies the funds that make up its revenues and expenditures, will be considered to be answered by the deposition of Richard Platto taken January 14, 2020.

Any answers given on the forgoing topics in the corresponding depositions are to be considered binding upon the City for purposes of Rule 30(b)(6).

Plaintiffs and Defendant further agree that any interrogatories that Plaintiffs send to Defendant on the same date as this stipulation is submitted, and that have been sent to Defendants for review before the signing of this stipulation, will not count toward Plaintiffs' 25 allowed interrogatories under Rule 33(a)(1).

Respectfully submitted, this May 13, 2020.

**For Plaintiffs:**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this May 13, 2020, a true and correct copy of the **JOINT STIPULATION TO DESIGNATING CERTAIN INDIVIDUAL TESTIMONY AS ORGANIZATIONAL TESTIMONY OF DEFENDANT CITY OF DORAVILLE** was filed via the CM/ECF system and therefore electronically served on the following:

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